

quinn emanuel trial lawyers | washington, dc

51 Madison Ave, 22nd Floor, New York, New York 10010 TEL (212) 849 7000 FAX (212) 849 7100

December 12, 2023

VIA ECF

Honorable Katherine Polk Failla
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 618
New York, New York 10007

MEMO ENDORSED

Re: *In Re CT Group Holdings Limited*, Case No. 1:23-MC-00403

Dear Judge Failla:

Pursuant to Your Honor's Individual Practice Rules, the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Rule 5.2(b) and 7.1(d), and the United States District Court, Southern District of New York's Sealed Records Filing Instructions ("Filing Instructions"), Petitioner CT Group Holdings Limited ("CT Group" or the "Petitioner") respectfully submits this Letter Motion for Leave to File Under Seal Certain Portions of Petitioner's Letter Motion to Stay Consideration of Petitioner's 1782 Application ("Letter Motion to Stay"). Petitioner's Letter Motion to Stay and attached Declaration refer to confidential Foreign Proceedings that contain personal identifying information that is not relevant to the Court's ruling, *Farrell v. City of New York*, No. 1:23-CV-04329 (JLR), 2023 WL 3936725, at *2 (S.D.N.Y. June 9, 2023), and that pertains to parties who are not Respondents to Petitioner's 1782 Application, *Kewazinga Corp. v. Microsoft Corp.*, No. 1:18-CV-4500-GHW, 2021 WL 1222122, at *5 (S.D.N.Y. Mar. 31, 2021). The Letter Motion to Stay also contains references to documentation filed in related proceedings that are allegedly protected by a privacy order, which parties to the Foreign Proceedings have claimed are confidential.

For the same reasons laid out in Petitioner's Letter Motion for Leave to File Under Seal Certain Portions of Petitioner's 1782 Application, Dkt. No. 9, which this Court granted, Dkt. No. 16, Petitioner respectfully requests that this Court allow Petitioner to redact public filings of Petitioner's Letter Motion to Stay and supporting Declaration, and to file unredacted versions of the same under seal.

Respectfully Submitted,

/s/ Lucas Bento

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY | CHICAGO | WASHINGTON, DC | HOUSTON | SEATTLE | BOSTON
LONDON | TOKYO | MANNHEIM | HAMBURG | PARIS | MUNICH | SYDNEY | HONG KONG | BRUSSELS | ZURICH | SHANGHAI | PERTH | STUTTGART

Application GRANTED. The Clerk of Court is directed to maintain docket entry 32 under seal, viewable only to the parties and the Court.

The Clerk of Court is further directed to terminate the pending motion at docket entry 30.

Dated: December 15, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE